

National Animal Identification System Comments

Oregon Cattlemen's Association is a private nonprofit organization that represents over 2,200 cattle producers in the State of Oregon. We have had numerous conversations within our membership during the development of the NAIS system, whereby many diverse opinions arose. Our membership proposed answering a limited number of the questions posed by USDA. The answers to the questions Oregon Cattlemen's answered are contained below.

1. The Draft Strategic Plan calls for making the entire system mandatory by January 2009. Is a mandatory identification program necessary to achieve successful animal disease surveillance, monitoring, and response system to support Federal animal health programs? Please explain why or why not.

Oregon Cattlemen's Association believes that in order for the program to achieve total success it should be mandatory. We would, however, like to see market incentives built into the plan so that most producers will begin voluntarily using the system. If the market begins to pay dividends to producers who use the system then most will begin using it. If the correct incentives are built into the system it won't be necessary to force producers into the system. The sooner these market incentives are realized the sooner most producers will begin to utilize the system.

The economic impact in addition to inconvenience must be minimized in order to ensure adoption of the new tracking system. If the outlay is relatively low, more producers will begin using the system in the short term, however if the costs are high, adoption rates will be much lower and will remain lower until these costs subside.

If market demands are not produced then the system should become mandatory, however many producers will resent being forced to comply through regulation. If producers are forced to comply, we believe the compliance rate will be dramatically lower than if the market drives producers to comply.

2. In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to premises where they are to be commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give reasons for your response.

Oregon Cattlemen's Association believes that the person who controls the cattle should, first and foremost, be responsible for tracking the movements of the animals. If the owner and controller are the same person then it should be their responsibility. If the owner is not the controller then it will be very difficult for the owner to track the cattle's movement.

3. In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have facilities to tag their animals; thus, the Draft Program Standards document contains an option for tagging sites, which are authorized

premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option, i.e., can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farm? Please give the reasons for your response.

OCA supports the concept of group lot ID, thus making this type of operation unnecessary. If cattle remain in a group from the ranch to the processing plant it would be most cost effective to retain the ability for group lot ID, rather than require individual animal ID. This would be the least costly and most efficient system for the producer and if the buyer chooses to break the lot up it should be their responsibility to individually identify the animals at that point.

Modifying existing tracking and traceability programs, such as branding systems, is our preference for tracking cattle. We do not see NAIS as the only answer to a tracking system. This would prevent the need for additional systems to be adopted and would prevent these current systems from being repetitive. With minor adjustments many of these existing systems could be initiated to achieve the same result as the NAIS.

We feel that individual ear tagging is not the only workable solution. Ear tags are frequently torn out and lost. Many producers also use tattoos for their own tracking systems, which will limit the ability of placing an additional tattoo in the ear. We would advocate for an additional option to individual ID rather than ear tags. Some of our members have suggested an implanted chip be located in an animal.

4. The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?

A two-pronged approach would work best for data input into the system. An Internet based system would work extremely well for time and efficiency. Many producers would be able to input their information in a short amount of time, which would help with compliance. Electronic means are becoming more commonplace in all corners of the industry, forcing more producers to become computer savvy. This could be one more way to further build their operation to fit with more technology.

A system whereby a producer could mail in his information would be our choice for another way to allow data input for non computer literate producers. Some producers still have no means of achieving compliance through a technology-based system. Many records are still kept by hand and this would be one other easy way to ensure compliance. This is a viable option for producers that don't own a computer or have no desire to learn to use any new technology.

5. What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd-management computer system, mail, phone, third-part submission of data)? Does this type of entity (e.g., producer, market slaughterhouse), the size of the entity, or other factors

make some methods of information submission more or less practical, costly, or efficient? Please provide supporting information if possible.

The most cost effective and efficient system would be an Internet based system. Producers should be able to directly input their information into a database. In addition, they should be able to download and transfer their data from their existing management software directly onto the Internet system.

For producers that don't have the ability or inclination to use the Internet based system, a mail-based system would be our choice for a secondary approach. This would allow producers to input all of the information onto a standard form creating limited confusion.

Many large producers and handlers may use an Internet based system whereby they would be able to import their cattle tracking and management information into an Internet system. We would be in favor of allowing producers, regardless of size, to be able to choose how they would prefer to input information. Time management and efficiency will drive producers to adopt the best system for their individual needs.

Allowing the most types of input options would allow more producers to comply and be able to choose their preferred method of tracking. A host of different options will allow more producers to comply with the system rather than limiting them to a specific type of tracking system.

6. We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?

Oregon Cattlemen's Association would prefer to see a nonprofit private organization hold the data. The process that determines the holding entity should be open for discussion. In our belief the system should be put out for bid and the party that can manage the system most cost effectively while ensuring confidentiality should be the winning business.

Confidentiality is the most important aspect of the database. Many of our producers are concerned of the ramifications if data ends up in the wrong hands. None of the information in the database should be disseminated without the producers consent. Each producer should have the option to have his information protected from disclosure. Producers are concerned about the liability and risk of an organization that hasn't been friendly to the cattle industry obtaining the information. One option may be for producers to individually notify the database if they wish for their information to be released to third parties. The database should be protected unless the individual producer allows it to be released.

A concern among producers is vulnerability of the Freedom of Information Act (FOIA). There has been no assurance that the information contained in this database would be exempt from this provision. The likelihood of the information being released could hinge on a court's decision. Producers do not want this type of information being released to anyone they do not approve of.

NCBA has recently proposed the idea that they are very interested in becoming the organization, which should control the information contained in the database. We are strongly opposed to this concept because there is potential for a conflict of interest.

NCBA may use the information contained in the database for marketing, membership recruitment, etc, all in an attempt to increase profits. We feel that this information should not be used for any purpose by any holding organization. All organizations showing an interest in holding the database should reveal any conflict of interest with possessing such producer information.